

4.5

HW 8.10

CC: (copy)

HW Sect 4.5

OR 7398
10.16.85

Van Waters & Rogers
division of **Univar**

REGIONAL OPERATIONS DIVISION
DEPARTMENT OF ENVIRONMENTAL QUALITY

R E E I V E D
OCT 21 1985

BOX 10287
PORTLAND, OR 97210
PHONE (503) 222-1721

*Gary
Laura*

FREE COPY

October 16, 1985

CERTIFIED MAIL

Mr. Fred M. Bolton
Administrator, Regional Operations
Department of Environmental Quality
522 S. W. 5th Avenue (Box 1760)
Portland, OR 97206

RE: NOTICE OF VIOLATION HW-NWR-85-117 MULTNOMAH COUNTY
ORD 009227398

Dear Mr. Bolton:

Although the Notice of Violation did not request a response to violations in Subparagraph F, we feel comment should be made on several of the violations cited.

We have renumbered our manifests to a five digit number as required in Part 262 Appendix. Further we have, by mass mailing, informed generators from whom we have received waste of this manifesting requirement.

F-3-(a) The Manifest Document No. 83347622 was proper as this was a California Manifest as required (refer to 40CFR 262.21).

F-3-(c) The reportable quantity notation is not required if the package size is less than the (RQ) 49CFR 172.101 (9).

F-4-(g) We are enclosing the manufacturer's instructions showing the proper description.

F-5-(a) Same as F-3-(a)

We are troubled by not having been informed of the five digit manifest number requirement until we received your letter of September 23, 1985. We have had many manifest audit meetings with the DEQ over the past four years, and quarterly we have submitted a report of manifests for audit. How this requirement escaped both the DEQ and ourselves is a matter for concern.

Hazardous & Solid Waste
Dept of Environmental

R E E I V E D
OCT 21 1985

Yours very truly,

VAN WATERS & ROGERS

Jack F. Johnston
Jack F. Johnston
Vice President
Portland Area Manager

USEPA RCRA



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JFJ:ac
Enclosure